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9	BODY SHOP, INC.

UNITED STATES DISTRICT COURT CENTRAL DISTRICT OF CALIFORNIA

JOHN W. SIGLER,

Plaintiff,

16

JORGE GONZALES, USAA 18 CASUALTY INSURANCE

CASUALTY INSURANCE
COMPANY, INTERINSURANCE

EXCHANGE OF AUTOMOBILE

20 CLUB, IMPERIAL BODY SHOP,

INC., PABLO GALVEZ, GREG

²¹ TAYLOR, MELISSA ORDELL,

22 DANELLE BUSHNELL, AMBER

PETERSON (aka AMBER PETERSON

v.

FORREST, aka AMBER J.

24 | SCHNEIDER), KEVIN

25 KARAPOGOSIAN, JAMES SYRING,

RANDY TERMEER, JOHN BOYLE,

26 and DOES 1 to 99, inclusive,

Defendants.

Case No. 8:22-cv-2325-CJC (JDE)

DEFENDANT IMPERIAL BODY SHOP, INC.'S ANSWER TO FIRST AMENDED COMPLAINT FOR DAMAGES; DEMAND FOR JURY TRIAL

4853-8346-3304.2

Pursuant to Rule 8(b) of the Federal Rules of Civil Procedure, Defendant IMPERIAL BODY SHOP, INC. ("Defendant") answers the First Amended Complaint for Damages ("FAC") of Plaintiff JOHN W. SIGLER ("Plaintiff"). If an averment is not specifically admitted, it is hereby denied.

ANSWER TO FIRST AMENDED COMPLAINT

- 1. Answering Paragraph 1, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 2. Answering Paragraph 2, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 3. Answering Paragraph 3, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 4. Answering Paragraph 4, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 5. Answering Paragraph 5, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis 4853-8346-3304.2

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denies generally and specifically each and every of the allegations contained therein. 2 Defendant also denies all liability and wrongdoing.

- Answering Paragraph 6, Defendant lacks sufficient knowledge or 6. information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 7. Answering Paragraph 7, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 8. Answering Paragraph 8, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 9. Answering Paragraph 9, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 10. Answering Paragraph 10, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- Answering Paragraph 11, Defendant admits that it is a business 11. 4853-8346-3304.2

- 12. Answering Paragraph 12, Defendant admits that Pablo Galvez was an individual employed by Imperial Body Shop in La Habra, California. As to the remaining allegations of Paragraph 12, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of those factual allegations to enable Defendant to answer the remaining allegations, as stated, and on that basis denies generally and specifically each and every of the remaining allegations. Defendant denies all liability and wrongdoing.
- 13. Answering Paragraph 13, Defendant admits that Greg Taylor was an individual employed by Imperial Body Shop in La Habra, California. As to the remaining allegations of Paragraph 13, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of those factual allegations to enable Defendant to answer the remaining allegations, as stated, and on that basis denies generally and specifically each and every of the remaining allegations. Defendant denies all liability and wrongdoing.
- 14. Answering Paragraph 14, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 15. Answering Paragraph 15, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis 4853-8346-3304.2

denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.

- 16. Answering Paragraph 16, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 17. Answering Paragraph 17, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 18. Answering Paragraph 18, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 19. Answering Paragraph 19, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 20. Answering Paragraph 20, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 21. Answering Paragraph 21, Defendant lacks sufficient knowledge or 5

information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.

- 22. Answering Paragraph 22, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 23. Answering Paragraph 23, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 24. Answering Paragraph 24, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 25. Answering Paragraph 25, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 26. Answering Paragraph 26, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein.

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Defendant also denies all liability and wrongdoing.

- 27. Answering Paragraph 27, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 28. Answering Paragraph 28, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 29. Answering Paragraph 29, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 30. Answering Paragraph 30, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 31. Answering Paragraph 31, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 32. Answering Paragraph 32, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained 4853-8346-3304.2

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therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.

- 33. Answering Paragraph 33, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 34. Answering Paragraph 34, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 35. Answering Paragraph 35, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 36. Answering Paragraph 36, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 37. Answering Paragraph 37, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein.
- Defendant also denies all liability and wrongdoing.

- 38. Answering Paragraph 38, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 39. Answering Paragraph 39, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 40. Answering Paragraph 40, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 41. Answering Paragraph 41, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 42. Answering Paragraph 42, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 43. Answering Paragraph 43, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis 4853-8346-3304.2

- 44. Answering Paragraph 44, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 45. Answering Paragraph 45, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 46. Answering Paragraph 46, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 47. Answering Paragraph 47, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 48. Answering Paragraph 48, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 49. Answering Paragraph 49, Defendant lacks sufficient knowledge or 10

information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.

- 50. Answering Paragraph 50, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 51. Answering Paragraph 51, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 52. Answering Paragraph 52, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 53. Answering Paragraph 53, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 54. Answering Paragraph 54, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein.

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Defendant also denies all liability and wrongdoing.

- 55. Answering Paragraph 55, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 56. Answering Paragraph 56, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 57. Answering Paragraph 57, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 58. Answering Paragraph 58, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 59. Answering Paragraph 59, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 60. Answering Paragraph 60, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained 4853-8346-3304.2

therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.

- 61. Answering Paragraph 61, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 62. Answering Paragraph 62, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 63. Answering Paragraph 63, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 64. Answering Paragraph 64, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 65. Answering Paragraph 65, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.

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- 66. Answering Paragraph 66, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 67. Answering Paragraph 67, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 68. Answering Paragraph 68, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 69. Answering Paragraph 69, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 70. Answering Paragraph 70, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 71. Answering Paragraph 71, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis 4853-8346-3304.2

denies generally and specifically each and every of the allegations contained therein.

Defendant also denies all liability and wrongdoing.

72. Answering Paragraph 72, Defendant lacks sufficient knowledge or

- information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 73. Answering Paragraph 73, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 74. Answering Paragraph 74, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 75. Answering Paragraph 75, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 76. Answering Paragraph 76, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 77. Answering Paragraph 77, Defendant lacks sufficient knowledge or 4853-8346-3304.2

information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.

- 78. Answering Paragraph 78, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 79. Answering Paragraph 79, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 80. Answering Paragraph 80, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 81. Answering Paragraph 81, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 82. Answering Paragraph 82, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein.

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Defendant also denies all liability and wrongdoing.

- 83. Answering Paragraph 83, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 84. Answering Paragraph 84, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 85. Answering Paragraph 85, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 86. Answering Paragraph 86, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 87. Answering Paragraph 87, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 88. Answering Paragraph 88, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained 4853-8346-3304.2

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therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.

- 89. Answering Paragraph 89, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 90. Answering Paragraph 90, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 91. Answering Paragraph 91, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 92. Answering Paragraph 92, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 93. Answering Paragraph 93, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein.

Defendant also denies all liability and wrongdoing.

- 94. Answering Paragraph 94, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 95. Answering Paragraph 95, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 96. Answering Paragraph 96, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 97. Answering Paragraph 97, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 98. Answering Paragraph 98, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 99. Answering Paragraph 99, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis 4853-8346-3304.2

denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.

- 100. Answering Paragraph 100, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 101. Answering Paragraph 101, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 102. Answering Paragraph 102, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 103. Answering Paragraph 103, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 104. Answering Paragraph 104, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing..
- 105. Answering Paragraph 105, Defendant lacks sufficient knowledge or 4853-8346-3304.2

information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.

- 106. Answering Paragraph 106, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 107. Answering Paragraph 107, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 108. Answering Paragraph 108, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 109. Answering Paragraph 109, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 110. Answering Paragraph 110, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein.

Defendant also denies all liability and wrongdoing.

- 111. Answering Paragraph 111, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 112. Answering Paragraph 112, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing..
- 113. Answering Paragraph 113, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 114. Answering Paragraph 114, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 115. Answering Paragraph 115, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 116. Answering Paragraph 116, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained 4853-8346-3304.2

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16 19 therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.

- 117. Answering Paragraph 117, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 118. Answering Paragraph 118, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 119. Answering Paragraph 119, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 120. Answering Paragraph 120, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 121. Answering Paragraph 121, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein.
- Defendant also denies all liability and wrongdoing.

- 122. Answering Paragraph 122, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 123. Answering Paragraph 123, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 124. Answering Paragraph 124, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 125. Answering Paragraph 125, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 126. Answering Paragraph 126, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 127. Answering Paragraph 127, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis 4853-8346-3304.2

128. Answering Paragraph 128, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein.

denies generally and specifically each and every of the allegations contained therein.

Defendant also denies all liability and wrongdoing.

Defendant also denies all liability and wrongdoing.

- 129. Answering Paragraph 129, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 130. Answering Paragraph 130, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 131. Answering Paragraph 131, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 132. Answering Paragraph 132, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 133. Answering Paragraph 133, Defendant lacks sufficient knowledge or 4853-8346-3304.2

information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.

134. Answering Paragraph 134, Defendant lacks sufficient knowledge or

- 134. Answering Paragraph 134, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 135. Answering Paragraph 135, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 136. Answering Paragraph 136, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 137. Answering Paragraph 137, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 138. Answering Paragraph 138, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein.

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Defendant also denies all liability and wrongdoing.

139. Answering Paragraph 139, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.

- 140. Answering Paragraph 140, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 141. Answering Paragraph 141, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 142. Answering Paragraph 142, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 143. Answering Paragraph 143, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 144. Answering Paragraph 144, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained 4853-8346-3304.2

therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.

- 145. Answering Paragraph 145, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 146. Answering Paragraph 146, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 147. Answering Paragraph 147, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 148. Answering Paragraph 148, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 149. Answering Paragraph 149, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein.
- Defendant also denies all liability and wrongdoing.

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- 150. Answering Paragraph 150, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 151. Answering Paragraph 151, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 152. Answering Paragraph 152, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 153. Answering Paragraph 153, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 154. Answering Paragraph 154, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 155. Answering Paragraph 155, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis 4853-8346-3304.2

denies gener	ally and specifically eac	h and	d every of the	ne alle	gations cor	ntained there	ein
Defendant al	so denies all liability an	d wr	ongdoing.				
156	Answering Paragraph	156	Defendant	lacks	sufficient	knowledge	Ω.

- 156. Answering Paragraph 156, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 157. Answering Paragraph 157, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 158. Answering Paragraph 158, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 159. Answering Paragraph 159, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 160. Answering Paragraph 160, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 161. Answering Paragraph 161, Defendant lacks sufficient knowledge or 4853-8346-3304.2

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information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.

- 162. Answering Paragraph 162, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 163. Answering Paragraph 163, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 164. Answering Paragraph 164, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 165. Answering Paragraph 165, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 166. Answering Paragraph 166, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein.

Defendant also denies all liability and wrongdoing.

167. Answering Paragraph 167, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.

- 168. Answering Paragraph 168, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 169. Answering Paragraph 169, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 170. Answering Paragraph 170, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 171. Answering Paragraph 171, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 172. Answering Paragraph 172, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained 4853-8346-3304.2

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therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.

- 173. Answering Paragraph 173, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 174. Answering Paragraph 174, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 175. Answering Paragraph 175, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 176. Answering Paragraph 176, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 177. Answering Paragraph 177, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein.

Defendant also denies all liability and wrongdoing.

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178. Answering Paragraph 178, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.

- 179. Answering Paragraph 179, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 180. Answering Paragraph 180, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 181. Answering Paragraph 181, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 182. Answering Paragraph 182, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 183. Answering Paragraph 183, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis 4853-8346-3304.2

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Defendant also denies all liability and wrongdoing. 184. Answering Paragraph 184, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained

denies generally and specifically each and every of the allegations contained therein.

denies generally and specifically each and every of the allegations contained therein.

therein to enable Defendant to answer the allegations, as stated, and on that basis

Defendant also denies all liability and wrongdoing.

185. Answering Paragraph 185, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.

186. Answering Paragraph 186, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.

187. Answering Paragraph 187, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.

188. Answering Paragraph 188, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.

189. Answering Paragraph 189, Defendant lacks sufficient knowledge or 4853-8346-3304.2

- 190. Answering Paragraph 190, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 191. Answering Paragraph 191, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 192. Answering Paragraph 192, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 193. Answering Paragraph 193, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 194. Answering Paragraph 194, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein.

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Defendant also denies all liability and wrongdoing.

195. Answering Paragraph 195, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.

- 196. Answering Paragraph 196, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 197. Answering Paragraph 197, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 198. Answering Paragraph 198, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 199. Answering Paragraph 199, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 200. Answering Paragraph 200, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained 4853-8346-3304.2

therein to enable Defendant to answer the allegations, as stated, and on that basis
denies generally and specifically each and every of the allegations contained therein
Defendant also denies all liability and wrongdoing.

- 201. Answering Paragraph 201, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 202. Answering Paragraph 202, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 203. Answering Paragraph 203, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 204. Answering Paragraph 204, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 205. Answering Paragraph 205, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein.
- Defendant also denies all liability and wrongdoing.

206. Answering Paragraph 206, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.

- 207. Answering Paragraph 207, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 208. Answering Paragraph 208, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 209. Answering Paragraph 209, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 210. Answering Paragraph 210, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 211. Answering Paragraph 211, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis 4853-8346-3304.2

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denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.

- 212. Answering Paragraph 212, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 213. Answering Paragraph 213, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 214. Answering Paragraph 214, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 215. Answering Paragraph 215, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 216. Answering Paragraph 216, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 217. Answering Paragraph 217, Defendant lacks sufficient knowledge or 4853-8346-3304.2

- 218. Answering Paragraph 218, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 219. Answering Paragraph 219, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 220. Answering Paragraph 220, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 221. Answering Paragraph 221, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 222. Answering Paragraph 222, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein.

Defendant also denies all liability and wrongdoing.

- 223. Answering Paragraph 223, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
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- 225. Answering Paragraph 225, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 226. Answering Paragraph 226, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 227. Answering Paragraph 227, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 228. Answering Paragraph 228, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained 4853-8346-3304.2

therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein.

Defendant also denies all liability and wrongdoing.

229. Answering Paragraph 229. Defendant lacks sufficient knowledge or

- 229. Answering Paragraph 229, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
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- 233. Answering Paragraph 233, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein.
- Defendant also denies all liability and wrongdoing

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- 239. Answering Paragraph 239, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis 4853-8346-3304.2

denies generally and specifically each and every of the allegations contained therein.

Defendant also denies all liability and wrongdoing.

- 240. Answering Paragraph 240, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 241. Answering Paragraph 241, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 242. Answering Paragraph 242, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 243. Answering Paragraph 243, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 244. Answering Paragraph 244, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 245. Answering Paragraph 245, Defendant lacks sufficient knowledge or 455

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- 248. Answering Paragraph 248, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 249. Answering Paragraph 249, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 250. Answering Paragraph 250, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. 4853-8346-3304.2

Defendant also denies all liability and wrongdoing.

- 251. Answering Paragraph 251, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 252. Answering Paragraph 252, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
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- 254. Answering Paragraph 254, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 255. Answering Paragraph 255, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 256. Answering Paragraph 256, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained 4853-8346-3304.2

- 257. Answering Paragraph 257, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 258. Answering Paragraph 258, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 259. Answering Paragraph 259, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 260. Answering Paragraph 260, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 261. Answering Paragraph 261, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein.
- Defendant also denies all liability and wrongdoing.

- 262. Answering Paragraph 262, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 263. Answering Paragraph 263, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 264. Answering Paragraph 264, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 265. Answering Paragraph 265, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 266. Answering Paragraph 266, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 267. Answering Paragraph 267, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis 4853-8346-3304.2

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denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.

- 268. Answering Paragraph 268, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 269. Answering Paragraph 269, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 270. Answering Paragraph 270, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 271. Answering Paragraph 271, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 272. Answering Paragraph 272, Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 273. Answering Paragraph 1 under the header "Prayer," Defendant lacks 4853-8346-3304.2

sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.

- 274. Answering Paragraph 2 under the header "Prayer," Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 275. Answering Paragraph 3 under the header "Prayer," Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 276. Answering Paragraph 4 under the header "Prayer," Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 277. Answering Paragraph 5 under the header "Prayer," Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 278. Answering Paragraph 6 under the header "Prayer," Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations 4853-8346-3304.2

contained therein. Defendant also denies all liability and wrongdoing.

- 279. Answering Paragraph 7 under the header "Prayer," Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 280. Answering Paragraph 8 under the header "Prayer," Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 281. Answering Paragraph 9 under the header "Prayer," Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 282. Answering Paragraph 10 under the header "Prayer," Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 283. Answering Paragraph 11 under the header "Prayer," Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.
- 284. Answering Paragraph 12 under the header "Prayer," Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual 4853-8346-3304.2

allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.

285. Answering Paragraph 13 under the header "Prayer," Defendant lacks sufficient knowledge or information to form a belief concerning the truth of the factual allegations contained therein to enable Defendant to answer the allegations, as stated, and on that basis denies generally and specifically each and every of the allegations contained therein. Defendant also denies all liability and wrongdoing.

AFFIRMATIVE DEFENSES

Defendant pleads the following separate defenses. Defendant reserves the right to assert additional affirmative defenses that discovery indicates are proper.

FIRST AFFIRMATIVE DEFENSE

(Failure to State a Claim)

1. As a separate and first affirmative defense to the First Amended Complaint, and to the purported causes of action set forth therein, Defendant alleges that the First Amended Complaint fails to state facts sufficient to constitute a cause of action.

SECOND AFFIRMATIVE DEFENSE

(Apportionment of Fault)

2. As a separate and second affirmative defense to the First Amended Complaint and each purported cause of action contained therein, Defendant alleges that Plaintiff's damages, if any, were caused by the negligence and/or acts or omissions of parties other than the Defendant, whether or not parties to this action. By reason thereof, Plaintiff's damages, if any, as against the Defendant, must be reduced by the proportion of fault attributable to such other parties, and to the extent that this is necessary, Defendant may be entitled to partial indemnity from others on a comparative fault basis.

THIRD AFFIRMATIVE DEFENSE

(Assumption of Risk)

3. As a separate and third affirmative defense to the First Amended Complaint and each purported cause of action contained therein, Defendant alleges that Plaintiff, and/or the persons and/or entities acting on Plaintiff's behalf, assumed the risk of all conduct of the Plaintiff or his agents.

FOURTH AFFIRMATIVE DEFENSE

(Comparative Fault)

4. As a separate and fourth affirmative defense to the First Amended Complaint and each purported cause of action contained therein, Defendant alleges that Plaintiff's damages, if any, were caused by the primary negligence and/or acquiescence in the acts and omissions alleged in the First Amended Complaint by the Plaintiff, and Plaintiff's agents, employees, representatives, relatives, heirs, assigns, attorneys, and/or any others acting on Plaintiff's behalf. By reason thereof, Plaintiff is not entitled to damages or any other relief whatsoever as against Defendant.

FIFTH AFFIRMATIVE DEFENSE

(Compliance with the Law)

5. As a separate and fifth affirmative defense to the First Amended Complaint and each purported cause of action contained therein, Defendant alleges that the actions taken by Defendant were in full compliance with the law.

SIXTH AFFIRMATIVE DEFENSE

(Intervening and Superseding Cause)

6. As a separate and sixth affirmative defense to the First Amended Complaint and each purported cause of action contained therein, Defendant alleges that if Plaintiff suffered or sustained any loss, damage or injury as alleged in the First Amended Complaint, such loss, damage or injury was legally caused or contributed to by the negligence or wrongful conduct of other parties, persons or entities, and that 4853-8346-3304.2

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their negligence or wrongful conduct was an intervening and superseding cause of the loss, damage or injury of which Plaintiff complains.

SEVENTH AFFIRMATIVE DEFENSE

(No Malicious Intent)

7. As a separate and seventh affirmative defense to the First Amended Complaint and each purported cause of action contained therein, Defendant alleges that Defendant did not act with malicious intent to deprive any person of any Constitutional right or to cause any other injury and therefore is not liable.

EIGHTH AFFIRMATIVE DEFENSE

(Proximate Cause – Other Persons)

8. As a separate and eighth affirmative defense to the First Amended Complaint and each purported cause of action contained therein, Defendant alleges that the damages alleged to have been suffered by Plaintiff in the First Amended Complaint were proximately caused or contributed to by acts or failures to act of persons other than this answering Defendant, which acts or failures to act constitute an intervening and superseding cause of the damages alleged in the First Amended Complaint.

NINTH AFFIRMATIVE DEFENSE

(Proximate Cause – Plaintiff)

9. As a separate and ninth affirmative defense to the First Amended Complaint and each purported cause of action contained therein, Defendant alleges that the injuries and damages alleged in the First Amended Complaint by Plaintiff occurred, were proximately caused by and/or were contributed to by Plaintiff's own acts or failures to act and that Plaintiff's recovery, if any, should be reduced by an amount proportionate to the amount by which said acts caused or contributed to said alleged injury or damages.

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TENTH AFFIRMATIVE DEFENSE

(Unclean Hands)

10. As a separate and tenth affirmative defense to the First Amended Complaint and each purported cause of action contained therein, Defendant alleges that Plaintiff is barred in whole or in part from prosecuting the purported causes of action set forth in the First Amended Complaint by the doctrine of unclean hands.

WHEREFORE, Defendant prays for relief as follows:

- 1. That the First Amended Complaint be dismissed, with prejudice and in its entirety;
- 2. That Plaintiff take nothing by reason of his First Amended Complaint and that judgment be entered against Plaintiff and in favor of Defendant;
 - 3. That Defendant be awarded its costs incurred in defending this action;
- 4. That Defendant be granted such other and further relief as the Court may deem just and proper.

DATED: October 23, 2023 Respectfully submitted,

MANNING & KASS ELLROD, RAMIREZ, TRESTER LLP

By: /s/ Jeffrey M. Lenkov
Jeffrey M. Lenkov
Attorneys for Defendant Imperial Body
Shop, Inc.

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DEMAND FOR JURY TRIAL

	Defendant IMPERIAL BODY SHOP, IN	NC. hereby demands trial of this matter
by ju	ury.	

DATED: October 23, 2023 Respectfully submitted,

MANNING & KASS ELLROD, RAMIREZ, TRESTER LLP

By: /s/ Jeffrey M. Lenkov
Jeffrey M. Lenkov
Attorneys for Defendant Imperial Body
Shop, Inc.

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PROOF OF SERVICE

STATE OF CALIFORNIA, COUNTY OF LOS ANGELES

At the time of service, I was over 18 years of age and not a party to this action. I am employed in the County of Los Angeles, State of California. My business address is 801 S. Figueroa St, 15th Floor, Los Angeles, CA 90017-3012.

On October 23, 2023, I served true copies of the following document(s) described as **DEFENDANT IMPERIAL BODY SHOP**, **INC.'S ANSWER TO FIRST AMENDED COMPLAINT FOR DAMAGES**; **DEMAND FOR JURY TRIAL** on the interested parties in this action as follows:

SEE ATTACHED SERVICE LIST

BY MAIL: I enclosed the document(s) in a sealed envelope or package addressed to the persons at the addresses listed in the Service List and placed the envelope for collection and mailing, following our ordinary business practices. I am readily familiar with the practice of Manning & Kass, Ellrod, Ramirez, Trester LLP for collecting and processing correspondence for mailing. On the same day that correspondence is placed for collection and mailing, it is deposited in the ordinary course of business with the United States Postal Service, in a sealed envelope with postage fully prepaid. I am a resident or employed in the county where the mailing occurred. The envelope was placed in the mail at Los Angeles, California.

ONLY BY ELECTRONIC TRANSMISSION: Only by emailing the document(s) to the persons at the e-mail address(es). This is necessitated during the declared National Emergency due to the Coronavirus (COVID-19) pandemic because this office will be working remotely, not able to send physical mail as usual, and is therefore using only electronic mail. No electronic message or other indication that the transmission was unsuccessful was received within a reasonable time after the transmission. We will provide a physical copy, upon request only, when we return to the office at the conclusion of the National Emergency.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

Executed on October 23, 2023, at Los Angeles, California.

/s/ Linda Lopez	
Linda Lopez	

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SERVICE LIST 1 Sigler v. Gonzalez, et al. Case No. 8:22-cv-02325-CJC-JDE 2 John W. Sigler 13129 Stern Avenue Plaintiff Pro Se La Mirada, CA 90638 4 Tel: (714) 697-8576 5 Email: JSigler@SWS-LLC.com Vivian I. Orlando, Esq. Alison J. Shilling, Esq. Attorneys for Defendant, USAA CASUALTY INSURANCE 6 Maynard Cooper and Gale LLP **COMPANY** 10100 Santa Monica Boulevard Suite 550 Los Angeles, CA 90067 Tel: (310) 596-4500 Email: vorlando@maynardcooper.com Email: ashilling@maynardcooper.com 10 Email:lborys@MaynardNexsen.com 11 Attorneys for Defendant, 12 Aparajito Sen, Esq. INTERINSURANCE EXCHANGE Eran Scott Forster, Esq. Ford Walker Haggerty and Behar LLP One World Trade Center, 27th Floor OF THE AUTOMOBILE CLUB OF SOUTHERN CALIFORNIA Long Beach, CA 90831-2700 14 Tel: (562) 983-2500 Fax: (562) 983-2555 15 Email: jsen@fwhb.com Email: eforster@fwhb.com Email: rbaptist@fwhb.com 17 18 19 20 21 22 23 24 25 26